

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ANDREW KRIVAK, JR.,

Plaintiff,

-against-

NOTICE OF MOTION

Docket No.: 23-cv-6960 (KMK)

PUTNAM COUNTY; Putnam County Sheriff's Department Sheriff ROBERT THOUBBORON, in his individual capacity; Putnam County Sheriff's Department Officers HAROLD TURNER, DANIEL STEPHENS, PATRICK CASTALDO, WILLIAM QUICK, JOHN DANIEL REES, WILLIAM ASHER in their individual capacities; Putnam County District Attorneys ROBERT V. TENDY and KEVIN WRIGHT, in their individual capacities; Putnam County Assistant District Attorneys LARRY GLASSER; CHANA KRAUSS; and CHRISTOPHER YORK, in their individual capacities; District Attorney Investigator RALPH CILENTO in his individual capacity; and DENISE ROSE,

Defendants.

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PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and Declaration of James A. Randazzo, and exhibits thereto, and upon all other papers and proceedings heretofore had herein, Defendants Robert V. Tendy, Kevin Wright, Larry Glasser, Chana Krauss and Christopher York, through their attorneys, Portale Randazzo LLP, will move this Court, at the United States District Courthouse, 300 Quarropas Street, White Plains, New York 10601 on a date and time designated by the Court for an Order pursuant to Fed. R. Civ. P. 12(b)(6) dismissing Plaintiff's Complaint as against them in its entirety, and for such other and further relief as the Court deems appropriate.

Dated: January 19, 2024
White Plains, New York

PORTALE RANDAZZO LLP

/s/ James A. Randazzo

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Drew W. Sumner
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To: Counsel of record via ECF.